

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

AARON LARRY BOWMAN.

Plaintiff

v.

OUACHITA PARISH SHERIFF'S
OFFICE, ET AL

Defendants

NO. 3:20-01372

JUDGE DOUGHTY

MAG. JUDGE HAYES

**SECOND MOTION FOR EXTENSION OF TIME
TO FILE RESPONSIVE PLEADINGS**

NOW COME the Monroe Police Department and the city of Monroe, Louisiana ("City Defendants") who respectfully request an extension of time to file responsive pleadings in this matter for the following reasons:

1. This tort and civil rights action was filed in Louisiana state court on September 21, 2020 and served on the City Defendants on September 28, 2020.
2. This matter was removed to federal court on October 22, 2020.
3. The City Defendants previously obtained an extension of time to file responsive pleadings until November 13, 2020, largely based on an informal agreement reached in state court prior to removal.
4. The City Defendants have not yet filed responsive pleadings in this case. Co-Defendants, the Louisiana Department of Public Safety and the Board of Supervisors for the University of Louisiana System, have filed Rule 12(b) motions. Plaintiff has informed the City Defendants that he intends to file an amended complaint following

the Rule 12(b) motions, *see* Fed. R. Civ. Proc. 15, and the City Defendants have expressed no opposition to said amendment.

5. Plaintiff anticipates filing the amended complaint shortly. Because the amendment may alter the issues and analysis in this case and may moot any motions or pleadings filed by the City Defendants on November 13, 2020, the City Defendants request an extension of time to file responsive pleadings until 14 days after Plaintiff's amended complaint is filed into the record. *See* Fed. R. Civ. Proc. 15(a)(3).

6. Plaintiff has confirmed, through counsel, that he has no objection to the requested extension.

WHEREFORE, the premises considered, the Monroe Police Department and the city of Monroe, Louisiana request an extension of to file responsive pleadings until fourteen days after Plaintiff's amended complaint is filed into the record.

City of Monroe

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the court's electronic filing system.

BY: /s/ Brandon W. Creekbaum
Brandon W. Creekbaum